

# McElroy Deutsch

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December 20, 2022

## VIA ECF

The Honorable Tonianne J. Bongiovanni  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Ellman, et al. v. Platkin, et al.*  
Civil Action No. 22-4397(FLW)(TJB)

Dear Judge Salas:

We represent defendant Ryan McNamee, named as a defendant in this matter in his official capacity as the Chief of the Chester Township Police Department (“Defendant”). We write with the consent of counsel for Plaintiffs to respectfully request a brief extension of time to file an answer. Defendant’s answer was due on November 16, 2022. Assuming Your Honor approves this request, we are prepared to file an answer within five (5) days of the entry of an order approving the extension of time to answer.

We have included a “So Ordered” provision at the end of this letter in the hope that this request meets with Your Honor’s approval.

Respectfully yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ *Kathleen N. Fennelly*

KATHLEEN N. FENNELLY

cc: All counsel (via ECF and e-mail)

**SO ORDERED** this \_\_\_\_\_ day of December, 2022.

\_\_\_\_\_  
HON. TONIANNE J. BONGIOVANNI  
United States Magistrate Judge